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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA) CASE NO. CR 14-00651 TEH
14 v.)
15 LUIS GONZALO CAUICH CARBAJAL,) STIPULATION AND ~~PROPOSED~~ ORDER
16 Defendant.) EXCLUDING TIME FROM OTHERWISE
) APPLICABLE SPEEDY TRIAL ACT
) CALCULATION

17)

18 **STIPULATION**

19 IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

20 1. The parties were originally scheduled to appear before the Court on August 31, 2015 at
21 2:30 p.m. for a status hearing. Due to a scheduling conflict, the government requested the parties
22 reschedule the August 31, 215 date. The parties agreed to stipulate to a continuance of the matter, with
23 time excluded for effective preparation of counsel, to allow defense counsel to review discovery.

24 2. Accordingly, the parties' discussed rescheduling this matter to September 14, 2015 at
25 2:30 p.m., with the understanding that the parties would submit a Stipulation and Proposed Order
26 excluding time.

27 3. The parties now formalize their request for a continuance of this matter to September 14,
28 2015 at 2:30 p.m. for a further status conference, and respectfully submit and agree that the period from

1 August 31, 2015 through and including September 14, 2015 should be excluded from the otherwise
2 applicable Speedy Trial Act computation because the continuance is necessary for effective preparation
3 of counsel, taking into account the exercise of due diligence. Specifically, the time requested for
4 exclusion will allow defense counsel to review discovery.

5 IT IS SO STIPULATED.

6

7 DATED: August 20, 2015

MELINDA HAAG
United States Attorney

9 _____/s/
10 MICHAEL MAFFEI
11 Assistant United States Attorney

12 DATED: August 20, 2015

13 _____/s/
14 GABRIELA BISCHOF
15 Counsel for the Defendant

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18 **[PROPOSED] ORDER**

19 Based upon the above-described Stipulation, THE COURT FINDS THAT the ends of justice
20 served by granting a continuance from August 31, 2015 through and including September 14, 2015
21 outweigh the best interest of the public and the defendant in a speedy trial, and that failure to grant such
22 a continuance would unreasonably deny the defendant the reasonable time necessary for effective
23 preparation, taking into account the exercise of due diligence.

24 Accordingly, THE COURT ORDERS THAT:

25 1. The parties shall appear before the Court on September 14, 2015 at 2:30 p.m. for further
26 status conference.

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1 2. The period from August 31, 2015 through and including September 14, 2015 is excluded
2 from the otherwise applicable Speedy Trial Act computation, pursuant to 18 U.S.C. § 3161(h)(7)(A) &
3 (B)(iv).

4 IT IS SO ORDERED.

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6 DATED: 08/25/2015

